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Date: 9/8/2022 11:37:14 AM  
Subject: Bradford Island Draft FFA - Yakama Nation Requests  
Attachments: [2022-08-16 YN BI Mednick FFA Comment FINAL.pdf](#)

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Hello Ann and Jeff,

I am attaching a letter sent to EPA on behalf of the Yakama Nation. As you will see, the letter contains comments by the Tribe on the Ft. Eustis model FFA as it pertains to Bradford Island.

EPA is interested in taking these comments into account as we continue to consider the terms of the Bradford Island FFA. The Yakama Nation will otherwise have an opportunity to provide comments during the public comment period that will eventually ensue for the Bradford Island FFA, and so consideration of the comment letter at this time provides us with an early opportunity to address the Tribe's interests and concerns. There is some efficiency to therefore be gained by discussing these comments during our next negotiation session on the Bradford Island FFA.

Foremost in the comment letter is the desire of the Yakama Nation to be integrally involved in project management meetings and to have the opportunity for review and comment on plans and actions for Bradford Island under the FFA. The Yakama Nation has explained that this level of involvement is warranted because the environmental and public health outcomes at the Site directly impact members of the Tribe. EPA, Oregon and Washington have raised this issue before with USACE and EPA is again advocating for this type of allowance in the Bradford Island FFA. Such a level of participation by the Tribe is authorized by Section 120(f) of CERCLA, 42 U.S.C. § 9620(f), and would help create a more balanced relationship between the governments who each have an identified interest at the Site.

For these reasons, EPA would like for us to discuss this letter and its application to the Bradford Island FFA during our upcoming attorney meeting on September 19.

Respectfully,

Richard

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